

MEMORANDUM ENDORSEMENT

April 12, 2021

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The Honorable Kevin N. Fox
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 228
New York, New York 10007

Re: *Bilalov v. Gref & Sberbank CIB USA, Inc.*, No. 20-CV-09153 (GHW)(KNF)

Dear Judge Fox:

This firm represents Defendant Sberbank CIB USA, Inc. (“SCIB”) in the above-captioned matter. Together with Debevoise & Plimpton LLP, which represents Defendant Herman Gref, and Shpigel and Associates, P.C., which represents Plaintiff Akhmed Bilalov, we respectfully submit this letter pursuant to Rule 1(E) of Your Honor’s Individual Rules and Practices.

White & Case and Debevoise & Plimpton were both recently retained as counsel for SCIB and Mr. Gref, respectively. Mr. Gref and SCIB contend that they have not been served effectively under Rule 4 of the Federal Rules of Civil Procedure. However, they have agreed to waive formal service on the basis of the below proposed schedule which, subject to the Court’s approval, would extend Mr. Gref’s and SCIB’s time to answer, move, or otherwise respond to Plaintiff’s Amended Complaint to July 8, 2021.

Defendants’ Deadline to Answer, Move, or Respond to Amended Complaint	July 8, 2021
Plaintiff’s Deadline to Oppose any Motion to Dismiss Filed by Defendants	September 8, 2021
Defendants’ Deadline to Reply to any Opposition Filed by Plaintiff	October 8, 2021

There have been no previous requests for an extension of time in this matter. Plaintiff consents to Defendants’ request for additional time to answer, move, or otherwise respond to the Amended Complaint, subject to the Court’s endorsement of the above schedule. We thank the Court for its consideration.

Respectfully Submitted,

/s/ Kimberly A. Havlin

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Copies to Counsel of Record (via ECF Filing)

4/12/21

Application denied. Without more, the generous schedule proposed by the parties is not warranted. Therefore, the Court declines to adopt the proposed schedule.

SO ORDERED:

Kevin Nathaniel Fox

Kevin Nathaniel Fox, U.S.M.J.